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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Plaintiff,

Case: 2:22-cr-20417
Assigned To : Parker, Linda V.
Referral Judge: Grand, David R.
Filed: 8/10/2022
IND USA V HAYWOOD (LH)

v.

Violations: 18 U.S.C. § 922(g)(1)
21 U.S.C. § 841(a)(1)
18 U.S.C. § 924(c)

Michael Deshawn Haywood,

Defendant.

_____ /

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

*18 U.S.C. § 922(g)(1) –
Possession of a firearm by a prohibited person*

On or about July 21, 2022, in the Eastern District of Michigan, the defendant, MICHAEL DESHAWN HAYWOOD, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess two firearms: (1) one Smith & Wesson, model SD9 VE 9mm caliber pistol, and (2) one Glock model ³~~24~~.40 caliber pistol, said firearms having been in or affecting interstate commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWO

21 U.S.C. § 841(a)(1) –

Possession with intent to distribute a controlled substance (cocaine base)

On or about July 21, 2022, in the Eastern District of Michigan, the defendant, MICHAEL DESHAWN HAYWOOD, did knowingly and unlawfully possess with intent to distribute a substance containing a mixture and substance containing a detectable amount of cocaine base (crack cocaine), a Schedule II controlled substance; all in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THREE

18 U.S.C. § 924(c) –

Possession of firearms in furtherance of a drug trafficking crime

On or about July 21, 2022, in the Eastern District of Michigan, the defendant, MICHAEL DESHAWN HAYWOOD, did knowingly and unlawfully possess firearms, that is, the firearms described in Count One of this Indictment, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute a controlled substance as alleged in Count Two of this Indictment; all in violation of Title 18, United States Code, Section 924(c)(1)(A).

FORFEITURE ALLEGATION

18 U.S.C. § 924(d), 21 U.S.C. § 853(a), and 28 U.S.C. § 2461

The above allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 924(d), 21 U.S.C. § 853(a), and 28 U.S.C. § 2461.

Upon conviction of the controlled offense set forth above in Count Two of this Indictment, the defendant shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violations.

Upon conviction of the firearm offenses set forth above in Counts One and Three of this Indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) together with Title 28, United States Code, Section 2461(c), any firearm or ammunition involved in or used in the knowing commission of said offenses.

If any of the property described above, as a result of any act or omission of the defendant—

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or

- e. has been commingled with other property that cannot be divided without difficulty;

the United States of America shall be entitled to forfeit other property of defendant up to the value of the above described forfeitable property, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c).

THIS IS A TRUE BILL

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

DAWN N. ISON
United States Attorney

s/ Brandy R. McMillion
BRANDY R. MCMILLION
Chief, General Crimes Unit
Assistant United States Attorney

/s Erin L. Ramamurthy
ERIN L. RAMAMURTHY
Assistant United States Attorney

Dated: August 10, 2022

United States District Court
Eastern District of Michigan

Criminal Case Cover

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: BR

Case Title: USA v. Michael Deshawn Haywood

County where offense occurred : Wayne

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☒ Indictment/ ☐ Information --- no prior complaint.
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: _____]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

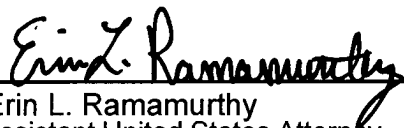
Superseding to Case No: _____ Judge: _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

August 10, 2022
Date


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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.